

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**NAVBLAZER, LLC,**

Apple

v.

**LG ELECTRONICS, INC., AND LG  
ELECTRONICS MOBILECOMM  
U.S.A., INC.,**

Defendants

**Case No. 6:20-cv-95**

**JURY TRIAL DEMANDED**

**ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

NavBlazer, LLC (“NavBlazer”) hereby files this Original Complaint for Patent Infringement against Defendants LG Electronics, Inc. and LG Electronics Mobilecomm U.S.A., Inc. (collectively, “Defendants”) and alleges, upon information and belief, as follows:

**THE PARTIES**

1. NavBlazer is a limited liability company organized and existing under the laws of the State of Florida with its principal place of business at 600 S. Dixie Highway, Suite 605, West Palm Beach, Florida 33401.
2. Defendant LG Electronics, Inc. is a corporation organized and existing under the laws of Korea with its principal place of business at LG Twin Towers, 128 Yeoui-daero, Yeongdungpo-gu, Seoul 150-721, Republic of Korea. On information and belief, this Defendant may be served with process at its principal place of business. Defendant LG Electronics, Inc. designs, makes, and sells many different products throughout the world for consumer use, including wireless mobile communications devices.

Defendant LG Electronics, Inc. is a parent corporation of Defendant LG Electronics Mobilecomm U.S.A., Inc.

3. Defendant LG Electronics Mobilecomm U.S.A., Inc. is a wholly-owned subsidiary of Defendant LG Electronics, Inc. and is a Delaware corporation with regular and established places of business in Texas at 9420 Research Blvd, Austin, Texas 78759; 21251-2155 Eagle Parkway, Fort Worth, Texas 76177; and 14901 Beach St, Fort Worth, TX 76177. Defendant LG Electronics Mobilecomm U.S.A., Inc. is registered to do business in the State of Texas and has been since at least April 3, 1984. Defendant LG Electronics Mobilecomm U.S.A., Inc. may be served with process at its registered agent for service of process at United States Corporation Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701.

#### **JURISDICTION AND VENUE**

4. This Court has subject matter jurisdiction over this case under 28 U.S.C. §§ 1331, 1332, 1338, and 1367.
5. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and 1400(b).
6. This Court has personal jurisdiction over Defendants. Defendants have continuous and systematic business contacts with the state of Texas. Defendants, directly or through subsidiaries or intermediaries (including distributors, retailers, and others), conduct business extensively throughout Texas, by shipping, distributing, making, using, offering for sale, selling, and advertising (including the provision of interactive web pages) their products and services in the state of Texas and the Western District of Texas. Defendants, directly and through subsidiaries or intermediaries (including distributors, retailers, and others), have purposefully and voluntarily placed infringing products and services into this district and into the stream of commerce with the intention and expectation that they will be purchased and used by consumers in this district. Defendants have offered and sold and

continue to offer and sell these infringing products and services in this district, including at physical stores located within this district. Defendants and their customers also commit additional acts of direct infringement in this district with respect to each asserted patent through their infringing use of the accused devices, including Defendants' servers, in this district, including when Defendants and their customers put the accused devices into service and receive a benefit, and Defendants are liable for these additional acts of direct infringement and indirect infringement in this district. Defendants have committed acts of infringement, both direct and indirect, in this district with respect to each asserted patent. More specifically, Defendant LG Electronics U.S.A., Inc. distributes wireless mobile communication devices to customers throughout the United States. Further, upon information and belief, Defendant LG Electronics Mobilecomm U.S.A., Inc. has regular and established places of business in this district at 9420 Research Blvd, Austin, Texas 78759; 21251-2155 Eagle Parkway, Fort Worth, Texas 76177; and 14901 Beach St, Fort Worth, TX 76177. Moreover, upon information and belief, Defendant LG Electronics Mobilecomm U.S.A., Inc. imports such wireless communication devices from its parent corporation Defendant LG Electronics, Inc. in South Korea, where they are designed and manufactured.

**U.S. PATENT NOS. 9,075,136 AND 9,885,782**

7. NavBlazer is the owner, by assignment, of U.S. Patent No. 9,075,136 and 9,885,782, each entitled "VEHICLE OPERATOR AND/OR OCCUPANT INFORMATION APPARATUS AND METHOD" (hereinafter collectively referred to as "the Patents-in-Suit").
8. The patent application that issued as the '782 Patent is a continuation application of U.S. Patent Application Ser. No. 09/259,957, filed March 1, 1999, and entitled "VEHICLE OPERATOR AND/OR OCCUPANT INFORMATION APPARATUS AND METHOD", now U.S. Pat. No. 9,075,136. U.S. Patent Application Ser. No. 09/259,957, filed March 1, 1999, claims priority to U.S.

Provisional Patent Application Ser. No. 60/076,800, filed March 4, 1998, and entitled “VEHICLE OPERATOR AND/OR OCCUPANT INFORMATION APPARATUS AND METHOD.”

9. The Patents-in-Suit are valid, enforceable, and were duly issued in full compliance with Title 35 of the United States Code.
10. The inventions described and claimed in the Patents-in-Suit were invented by Raymond Anthony Joao.
11. The priority date of each of the Patents-in-Suit is at least as early as March 4, 1998.
12. The Patents-in-Suit relate generally to an apparatus and method for providing a user with one or more possible travel routes to a destination, as well as additional information regarding the one or more possible travel routes, such as traffic conditions, road conditions, traffic flow, weather information and/or other useful information.
13. During prosecution of the '782 Patent, the patent examiner considered whether the claims of the '782 Patent were eligible under 35 USC §101 in view of the United States Supreme Court's decision in *Alice*. The patent examiner found that the claims are in fact patent eligible under 35 USC §101 because all pending claims are directed to patent-eligible subject matter, none of the pending claims are directed to an abstract idea and there would be no preemption of the abstract idea or the field of the abstract idea.

### **DEFENDANT'S PRODUCTS**

14. Upon information and belief, Defendant sells, advertises, offers for sale, uses, or otherwise provides mobile devices that utilize the Android operating system including, but not limited to, the “LG G8X ThinQ Dual Screen,” “LG G8X ThinQ,” “LG V50 ThinQ 5G,” “LG V40 ThinQ,” “LG V35 ThinQ,” “LG V30 ThinQ,” “LG V30,” “LG V20,” “LG G7 ThinQ,” “LG Neon Plus,” “LG Aristo 4+,” “LG

Aristo 3+,” “LG Aristo 3,” “LG Tribute Royal,” “LG Tribute Empire,” “LG Stylo 5+,” “LG Stylo 5,” “LG Stylo 4,” “LG Stylo 4 Plus,” “LG Stylo 3 Plus Titanium,” “LG Stylo 3 LTE,” “LG K40,” “LG K30,” “LG K20,” “LG Journey LTE,” “LG Rebel,” “LG Rebel 4 LTE,” “LG Xpression Plus 2,” “LG Xpression Plus,” “LG Harmony 3,” “LG Arena 2,” “LG Prime 2,” “LG Escape Plus,” “LG Solo LTE,” “LG K8S,” “LG G7 fit,” “LG Q7+,” “LG Premier Pro LTE,” “LG phoenix 4,” “LG Risio 3,” “LG Fortune 2,” “LG K8,” “LG K8+,” “LG X charge,” “LG G6,” “LG G6+,” “LG G5,” and “LG X venture” series of mobile devices (“Accused Instrumentalities”) that infringe the Patents-in Suit.

### **COUNT I**

#### **(Infringement of U.S. Patent No. 9,885,782)**

15. Plaintiff incorporates the above paragraphs by reference.
16. Defendant has been on notice of the ’782 Patent at least as early as the date it received service of this Original Complaint.
17. Upon information and belief, Defendant has directly infringed and continues to directly infringe at least Claims 1, 2 and 7 of the ’782 Patent by making, using, importing, selling, and/or, offering for sale the Accused Instrumentalities.
18. Defendant, with knowledge of the ’782 Patent, also infringes at least Claims 1, 2 and 7 of the ’782 Patent by inducing others to infringe the ’782 Patent. In particular, Defendant intends to induce its customers to infringe the ’782 Patent by encouraging its customers to use the Accused Instrumentalities in a manner that results in infringement.
19. Defendant also induces others, including its customers, to infringe at least Claims 1, 2 and 7 of the ’782 Patent by providing technical support for the use of the Accused Instrumentalities.

20. Upon information and belief, at all times Defendant owns and controls the operation of the Accused Instrumentalities in accordance with an end user license agreement.
21. By way of example, the Accused Instrumentalities infringe Claim 1 of the '782 Patent by use of a global positioning device, wherein the global positioning device determines a location of the apparatus or a location of a vehicle. Defendant's "LG G8 ThinQ" is a representative example of the Accused Instrumentalities and is a mobile device (apparatus). See Figure 1 below, which is an excerpt from the LG G8 ThinQ Specification Sheet, attached herein as Exhibit A, showing a picture of the LG G8 ThinQ.



Figure 1<sup>1</sup> - Defendant's LG G8 ThinQ

22. The LG G8 ThinQ uses a global positioning device, wherein the global positioning device determines a location of the apparatus or a location of a vehicle.
23. See Figure 2 below, which is an excerpt from the LG G8 ThinQ Specification Sheet indicating the LG

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<sup>1</sup> LG G8 ThinQ Specification Sheet – page 1

G8 ThinQ utilizes A-GPS and S-GPS “for Enhanced Location Accuracy.” A GPS device is necessarily required to utilize A-GPS and S-GPS. Further, it is well known that GPS location technology determines a location of the apparatus on which the GPS device is installed or located.

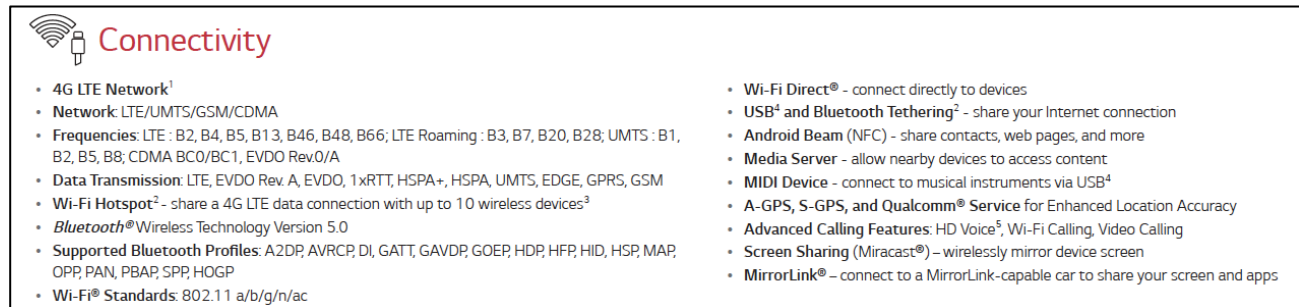


Figure 2<sup>2</sup> - LG G8 ThinQ Specs

24. See also Figure 3 below, which is an excerpt from the LG G8 ThinQ User’s Manual, attached herein as Exhibit B, indicating that the LG G8 ThinQ is loaded with the Google Maps application.

<sup>2</sup> LG G8 ThinQ Specification Sheet – page 4

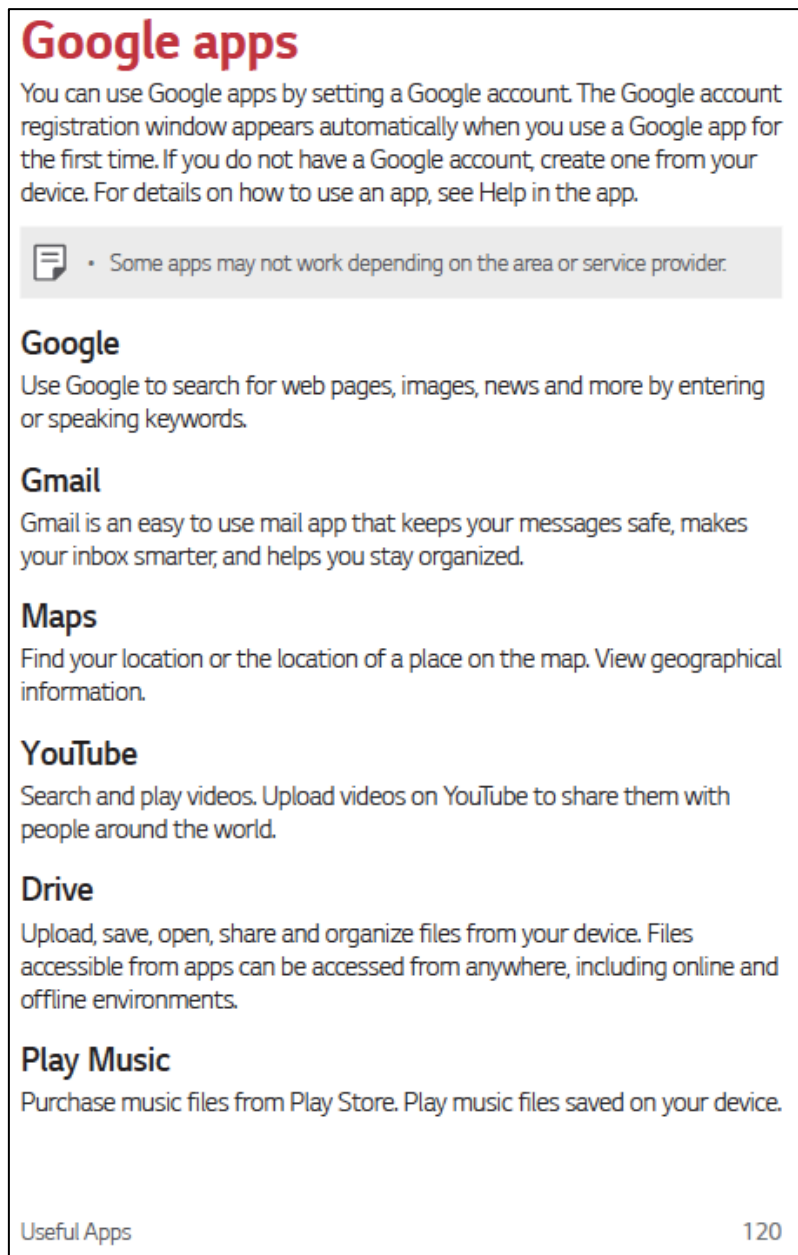
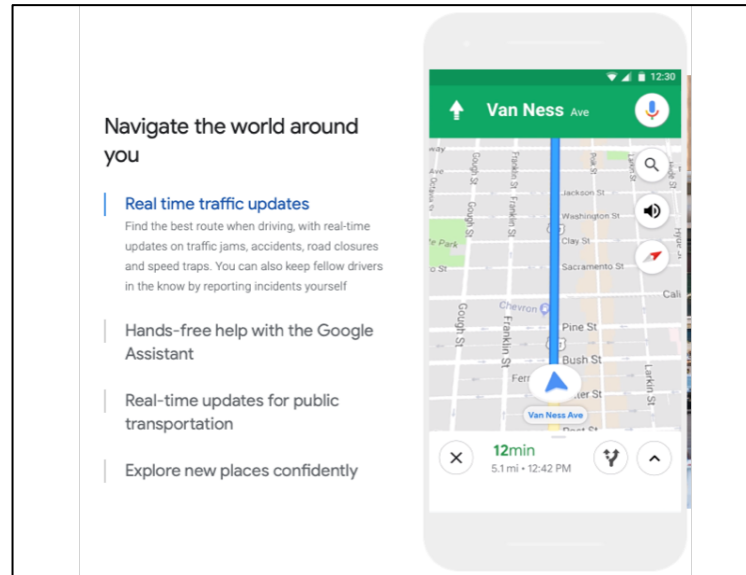


Figure 3<sup>3</sup> - Google Maps Application on the LG G8 ThinQ

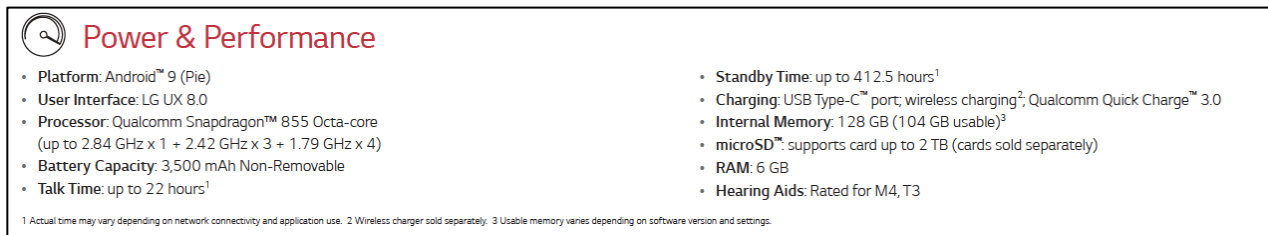
25. See also Figure 4 below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps. The blue arrow indicates the current location of the device.

<sup>3</sup> LG G8 ThinQ User Manual – page 120



Figure 4<sup>4</sup> - Google Maps navigation display

26. The LG G8 ThinQ uses a processing device, wherein the processing device processes information regarding the location of the apparatus or the location of the vehicle and information regarding a destination, wherein the processing device determines or identifies a travel route to the destination on or along a road, a roadway, a highway, a parkway or an expressway.
27. See Figure 5 below, which is an excerpt from the LG G8 ThinQ Specification Sheet indicating that it utilizes the Qualcomm Snapdragon 855 Octo-core processor.

Figure 5<sup>5</sup> - LG G8 ThinQ processor

28. The processing device used in the LG G8 ThinQ is necessarily used to process the information regarding the location of the apparatus or vehicle and the destination, as well as to calculate the travel

<sup>4</sup> <https://www.google.com/maps/about/#!/#jump-link> - 9/14/19

<sup>5</sup> LG G8 ThinQ Specification Sheet – page 4

route to the destination using the Google Maps application that is included with the LG G8 ThinQ.

29. See also Figure 4, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the LG G8 ThinQ. The blue arrow indicates the current location of the device and the blue line identifies the route to the destination along a road. Further, "12min" indicates the time remaining to the destination, and "5.1 mi • 12:42 PM" indicates the distance to the destination in miles and estimated time of arrival at the destination.

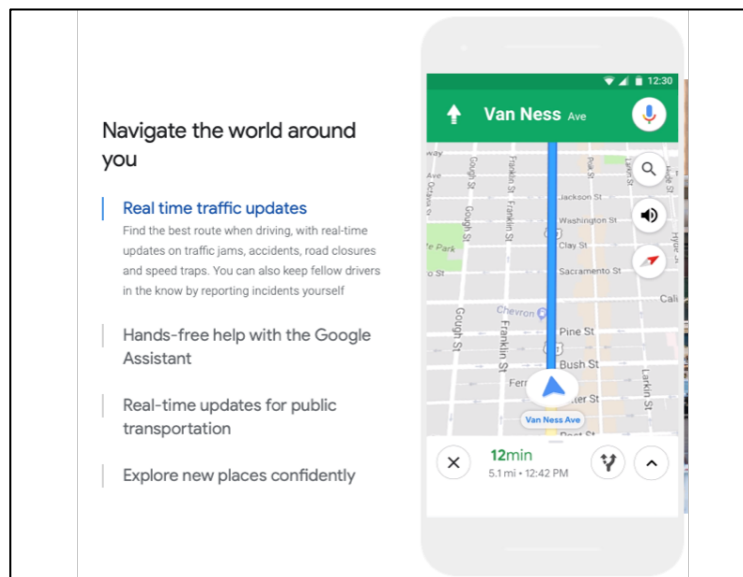


Figure 4 - Google Maps navigation display

30. The LG G8 ThinQ uses a display device or a speaker, wherein the display device displays information regarding the travel route or the speaker provides audio information regarding the travel route.
31. See Figure 1, reproduced below, showing the display of the LG G8 ThinQ.



Figure 1 - Defendant's LG G8 ThinQ

32. See also Figure 4, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the LG G8 ThinQ. The blue arrow indicates the current location of the device and the blue line identifies the route to the destination along a road. Further, "12min" indicates the time remaining to the destination, and "5.1 mi • 12:42 PM" indicates the distance to the destination in miles and estimated time of arrival at the destination.

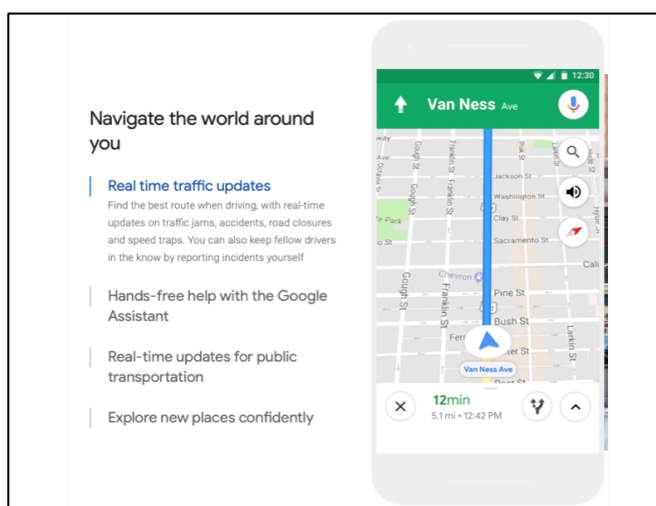


Figure 4 - Google Maps navigation display

33. The LG G8 ThinQ uses a receiver, wherein the receiver receives traffic information or information regarding a traffic condition.
34. See Figure 6 below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the LG G8 ThinQ. Google Maps is described as providing "Real-time traffic updates" and the mock up of the navigation display shows traffic information being displayed at the bottom of the device display. The device running the Google Maps application, such as the LG G8 ThinQ, must necessarily include a receiver for receiving real-time traffic information.

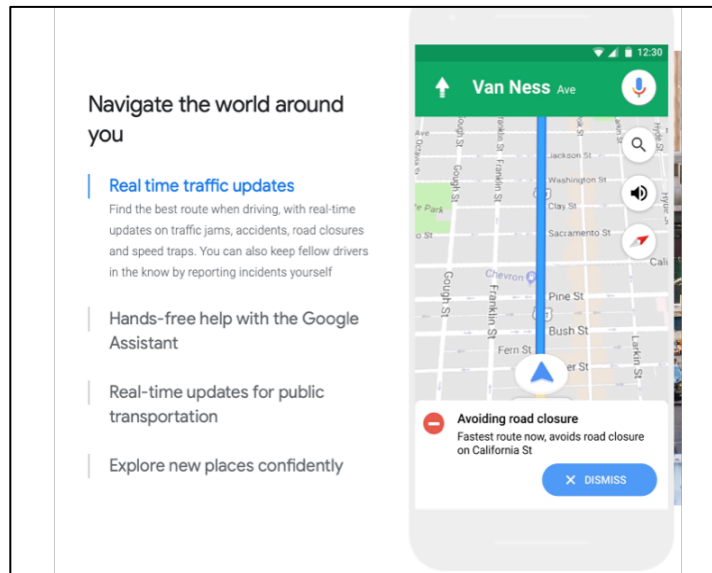


Figure 6<sup>6</sup> - Google Maps navigation display

35. The LG G8 ThinQ provides the traffic information or the information regarding a traffic condition via the display device or via the speaker.
36. See Figure 1, reproduced below, showing the display of the LG G8 ThinQ.

<sup>6</sup> <https://www.google.com/maps/about/#!/#jump-link> - 9/14/19



Figure 1 - Defendant's LG G8 ThinQ

37. See also Figure 6, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the LG G8 ThinQ. Google Maps is described as providing "Real-time traffic updates" and the mock up of the navigation display shows traffic information being displayed at the bottom of the device display.

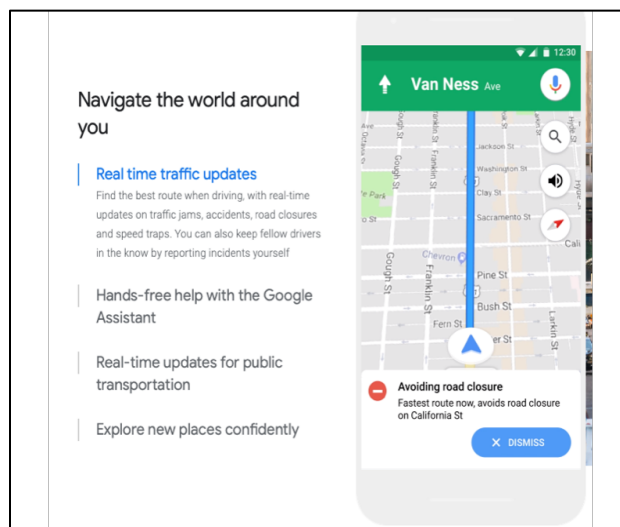


Figure 6 - Google Maps navigation display

38. By way of another example, the Accused Instrumentalities infringe Claim 7 of the '782 Patent by use

of an apparatus that “receives maintenance information associated with the travel route or maintenance information associated with a second travel route to the destination, and further wherein the apparatus provides the maintenance information associated with the travel route or the maintenance information associated with the second travel route via the display device or the speaker.”

39. See Figure 7 below, which is a screenshot from Google’s website explaining the meaning of various visual symbols used in the Google Maps application, which is included in the LG G8 ThinQ. The visual symbols include symbols indication “road closures” and “construction,” both of which can be considered “maintenance information.” Figure 7 also indicates that “[f]or road closures, you’ll find a dotted red line where the road is closed.” These symbols are visually displayed on the map that is displayed on the display device of the Accused Instrumentalities.

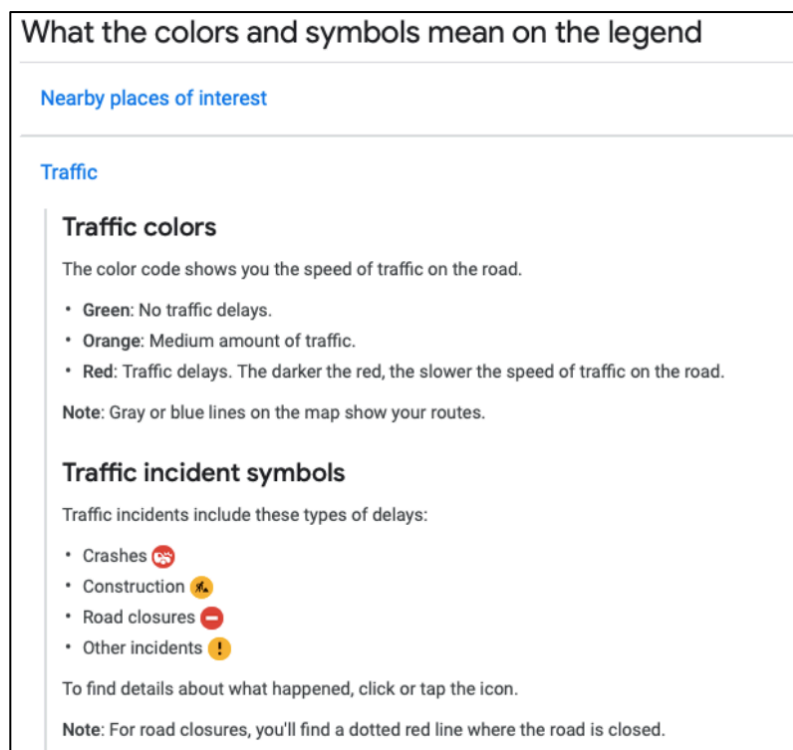


Figure 7<sup>7</sup> - Visual Symbols in the Google Maps Application

<sup>7</sup> [https://support.google.com/maps/answer/3092439?hl=en&ref\\_topic=3093390](https://support.google.com/maps/answer/3092439?hl=en&ref_topic=3093390) – 2/5/20

**(Infringement of U.S. Patent No. 9,075,136)**

40. Plaintiff incorporates the above paragraphs by reference.
41. Defendant has been on notice of the '136 Patent at least as early as the date it received service of this Original Complaint.
42. Upon information and belief, Defendant has infringed and continues to infringe at least Claims 55, 56, 61, 66, 69-71, 76, 79, 82, 85, 86, 88, 89, 91, 94, 97 and 98 of the '136 Patent by making, using, importing, selling, and/or, offering for sale the Accused Instrumentalities.
43. Defendant, with knowledge of the '136 Patent, infringes at least Claims 55, 56, 61, 66, 69-71, 76, 79, 82, 85, 86, 88, 89, 91, 94, 97 and 98 of the '136 Patent by inducing others to infringe at least Claims 55, 56, 61, 66, 69-71, 76, 79, 82, 85, 86, 88, 89, 91, 94, 97 and 98 of the '136 Patent. In particular, Defendant intends to induce its customers to infringe at least Claims 55, 56, 61, 66, 69-71, 76, 79, 82, 85, 86, 88, 89, 91, 94, 97 and 98 of the '136 Patent by encouraging its customers to use the Accused Instrumentalities in a manner that results in infringement.
44. Defendant also induces others, including its customers, to infringe at least Claims 55, 56, 61, 66, 69-71, 76, 79, 82, 85, 86, 88, 89, 91, 94, 97 and 98 of the '136 Patent by providing technical support for the use of the Accused Instrumentalities.
45. Upon information and belief, at all times Defendant owns and controls the operation of the Accused Instrumentalities in accordance with an end user license agreement.
46. By way of example, the Accused Instrumentalities infringe Claim 55 of the '136 Patent by use of a global positioning device, wherein the global positioning device determines a location of the apparatus or a location of a vehicle. Defendant's "LG G8 ThinQ" is a representative example of the Accused Instrumentalities and is a mobile device (apparatus). See Figure 1, reproduced

below, which is an excerpt from the LG G8 ThinQ Specification Sheet, attached herein as Exhibit A, showing a picture of the LG G8 ThinQ.



Figure 1 - Defendant's LG G8 ThinQ

47. The LG G8 ThinQ uses a global positioning device, wherein the global positioning device determines a position or a location of a vehicle.
48. See Figure 2, reproduced below, which is an excerpt from the LG G8 ThinQ Specification Sheet indicating the LG G8 ThinQ utilizes A-GPS and S-GPS “for Enhanced Location Accuracy.” A GPS device is necessarily required to utilize A-GPS and S-GPS. Further, it is well known that GPS location technology determines a location of the apparatus on which the GPS device is installed or located.

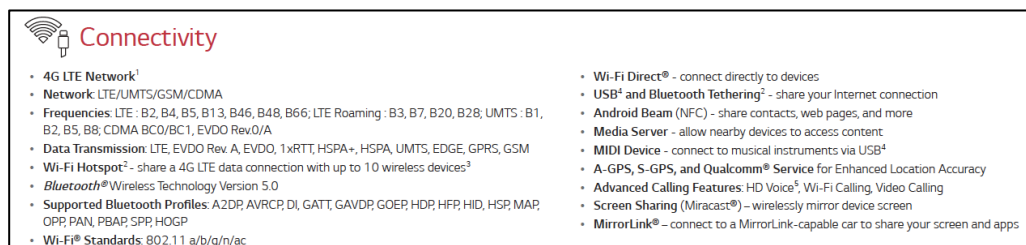


Figure 2 - LG G8 ThinQ Specs



49. See also Figure 3, reproduced below, which is an excerpt from the LG G8 ThinQ User's Manual, attached herein as Exhibit B, indicating that the LG G8 ThinQ is loaded with the Google Maps application.

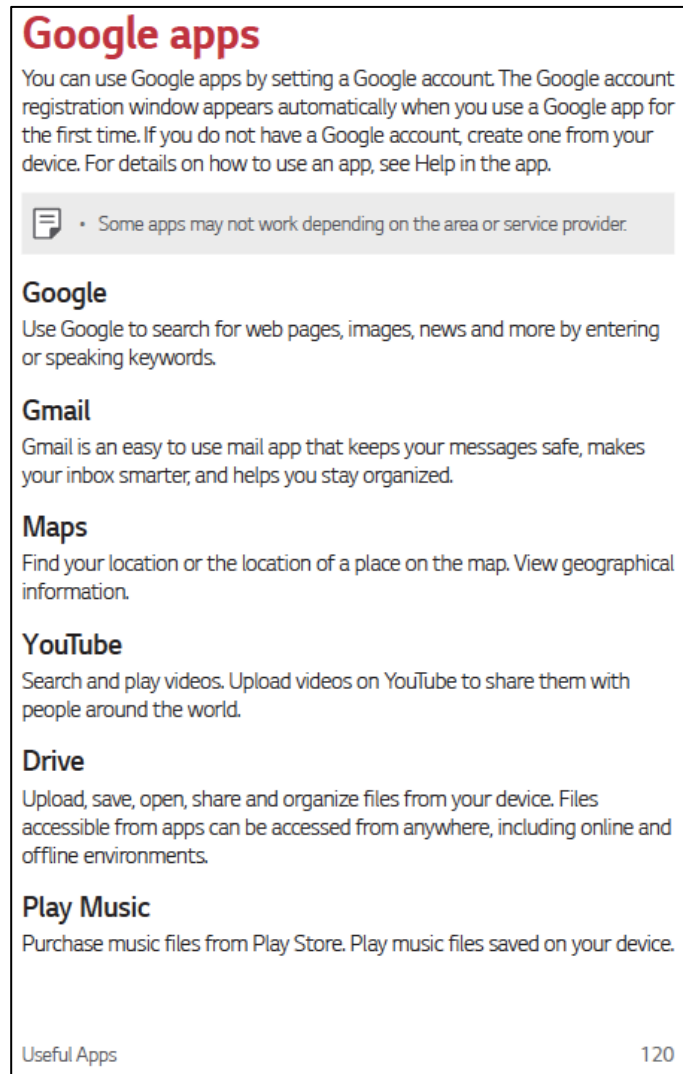


Figure 3 - Google Maps Application on the LG G8 ThinQ

50. See also Figure 4, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps. The blue arrow indicates the current location of the device.

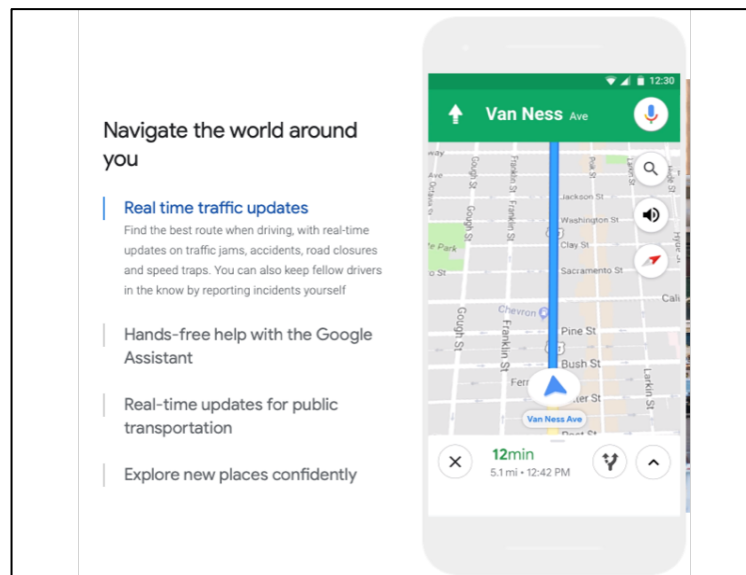


Figure 4 - Google Maps navigation display

51. The LG G8 ThinQ uses a processing device, wherein the processing device processes information regarding the position or the location of the vehicle and information regarding a destination to which the vehicle can travel on at least one of a road, a roadway, a highway, a parkway, and an expressway, and further wherein the processing device determines or identifies a travel route to the destination.
52. See Figure 5, reproduced below, which is an excerpt from the LG G8 ThinQ Specification Sheet indicating that it utilizes the Qualcomm Snapdragon 855 Octa-core processor.

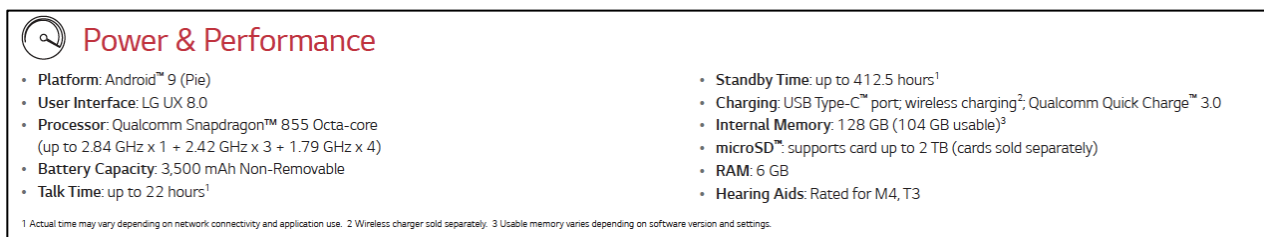


Figure 5 - LG G8 ThinQ processor

53. The processing device used in the LG G8 ThinQ is necessarily used to process the information regarding the location of the apparatus or vehicle and the destination, as well as to calculate the travel

route to the destination using the Google Maps application that is included with the LG G8 ThinQ.

54. See also Figure 4, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the LG G8 ThinQ. The blue arrow indicates the current location of the device and the blue line identifies the route to the destination along a road. Further, "12min" indicates the time remaining to the destination, and "5.1 mi • 12:42 PM" indicates the distance to the destination in miles and estimated time of arrival at the destination.

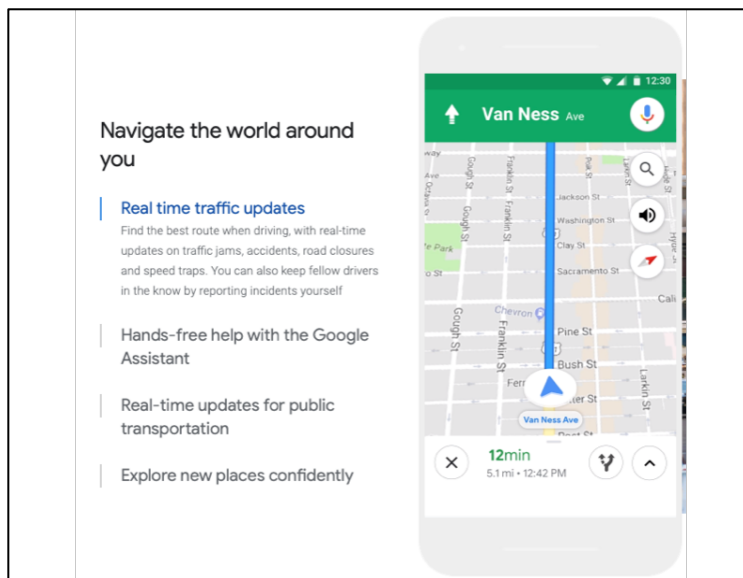


Figure 4 - Google Maps navigation display

55. The LG G8 ThinQ uses a display device or a speaker, wherein the display device displays information regarding the travel route or the speaker provides audio information regarding the travel route.
56. See Figure 1, reproduced below, showing the display of the LG G8 ThinQ.



Figure 1 - Defendant's LG G8 ThinQ

57. See also Figure 4, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the LG G8 ThinQ. The blue arrow indicates the current location of the device and the blue line identifies the route to the destination along a road. Further, "12min" indicates the time remaining to the destination, and "5.1 mi • 12:42 PM" indicates the distance to the destination in miles and estimated time of arrival at the destination.

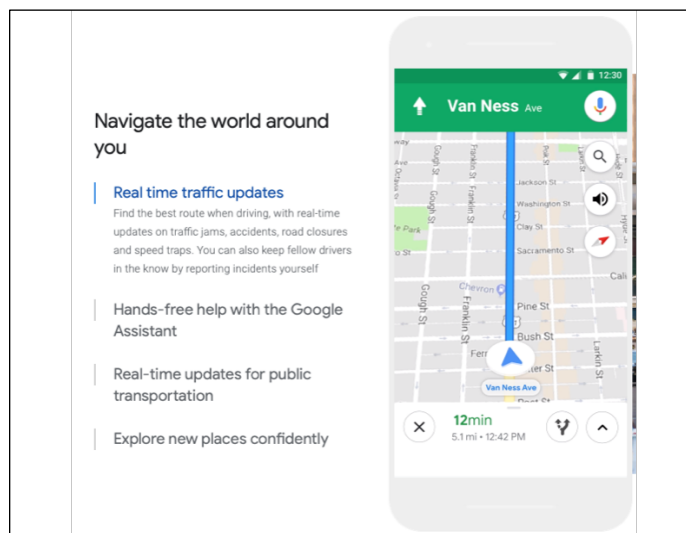


Figure 4 - Google Maps navigation display

58. The LG G8 ThinQ uses a receiver, wherein the receiver receives traffic information or information regarding a traffic condition, wherein the traffic information or the information regarding a traffic condition is transmitted from a computer, a transmitter, or a device, located at a location remote from the vehicle.
59. See Figure 6, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the LG G8 ThinQ. Google Maps is described as providing "Real-time traffic updates" and the mock up of the navigation display shows traffic information being displayed at the bottom of the device display. The device running the Google Maps application, such as the LG G8 ThinQ, must necessarily include a receiver for receiving real-time traffic information.

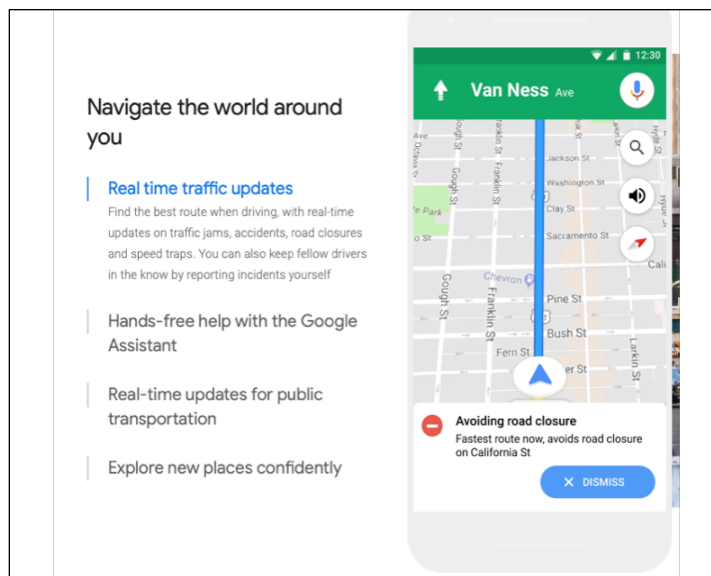


Figure 6 - Google Maps navigation display

60. The LG G8 ThinQ provides the traffic information or the information regarding a traffic condition at the vehicle via the display device or via the speaker.

61. See Figure 1, reproduced below, showing the display of the LG G8 ThinQ.



Figure 1 - Defendant's LG G8 ThinQ

62. See also Figure 6, reproduced below, which is a screenshot from Google's website showing a mock up of the navigation display for Google Maps, which is included with the LG G8 ThinQ. Google Maps is described as providing "Real-time traffic updates" and the mock up of the navigation display shows traffic information being displayed at the bottom of the device display.

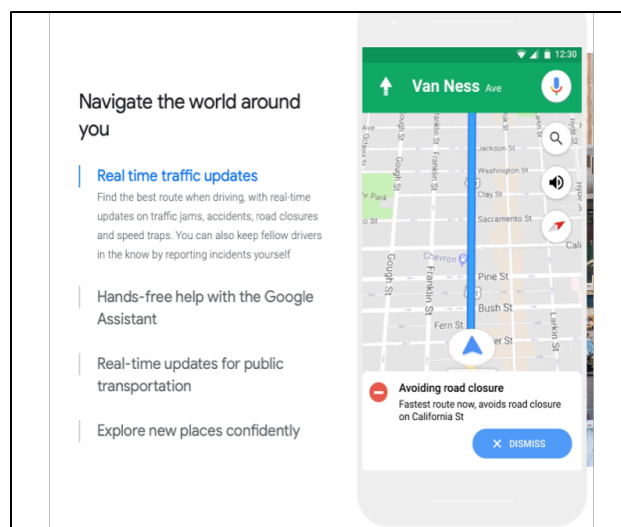


Figure 6 - Google Maps navigation display

63. By way of another example, the Accused Instrumentalities infringe Claims 61 of the '136 Patent by use of an apparatus that “receives maintenance information associated with the travel route or maintenance information associated with a second travel route to the destination, and further wherein the apparatus provides the maintenance information associated with the travel route or the maintenance information associated with the second travel route.”

64. See Figure 7 below, which is a screenshot from Google’s website explaining the meaning of various visual symbols used in the Google Maps application. The visual symbols include symbols indication “road closures” and “construction,” both of which can be considered “maintenance information.” Figure 7 also indicates that “[f]or road closures, you’ll find a dotted red line where the road is closed.” These symbols are visually displayed on the map that is displayed on the display device of the Accused Instrumentalities.

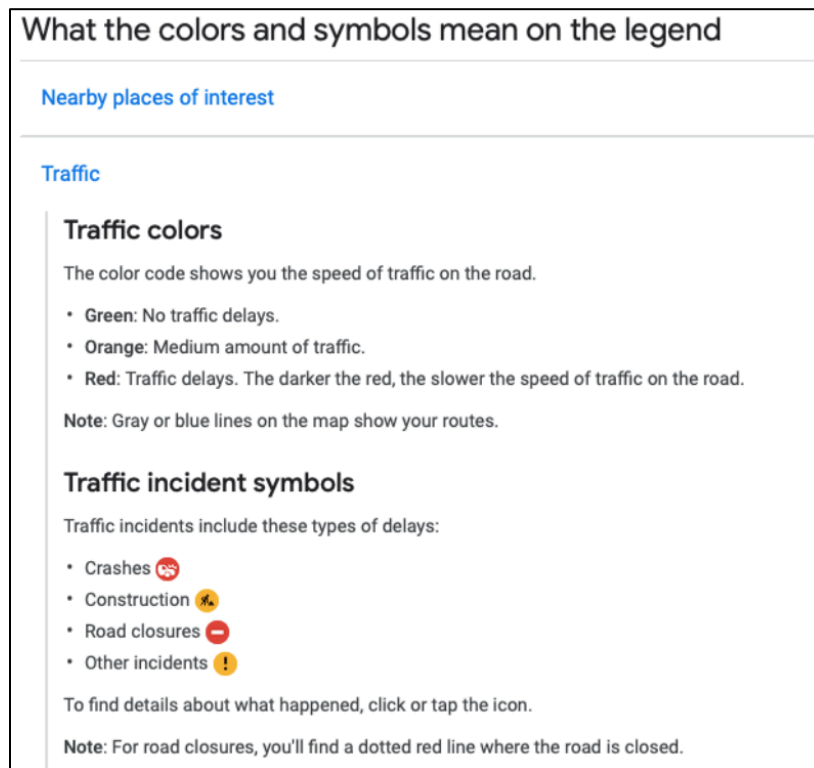


Figure 7<sup>8</sup> - Visual Symbols in the Google Maps Application

<sup>8</sup> [https://support.google.com/maps/answer/3092439?hl=en&ref\\_topic=3093390](https://support.google.com/maps/answer/3092439?hl=en&ref_topic=3093390) – 2/5/20

**PRAYER FOR RELIEF**

WHEREFORE, NavBlazer respectfully requests the Court enter judgment against

Defendant:

1. Declaring that Defendant has infringed each of the Patents-in-Suit;
2. Awarding NavBlazer its damages suffered as a result of Apple's infringement of the Patents-in-Suit;
3. Awarding NavBlazer its costs, attorneys' fees, expenses, and interest;
4. Awarding NavBlazer ongoing post-trial royalties; and
5. Granting NavBlazer such further relief as the Court finds appropriate.

**JURY DEMAND**

NavBlazer demands trial by jury, under Fed. R. Civ. P. 38.

Dated: February 7, 2020

Respectfully Submitted

*/s/ Thomas Fasone III*

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